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Amdt. dated November 8, 2005
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## REMARKS

Claims 1 to 12 were pending in the application at the time of final examination. Claims 1 to 12 remain rejected as anticipated.

Claims 1 to 12 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,748,420, hereinafter referred to as Quatrano.

Applicant thanks the Examiner for the clarification for the basis of the anticipation rejection. Applicant respectfully notes that the instant rejection is an anticipation rejection and not an obviousness rejection. The Examiner stated "The conclusion of obviousness may be made from common knowledge and common sense of a person of ordinary skill in the art without any specific hint or suggestion in a particular reference." Applicant respectfully submits that the MPEP establishes a requirement for an anticipation rejection that the reference must teach the invention in the same detail as recited in the claim. If the reference fails to teach the limitation, the limitation must be inherent in the teachings of the reference. This is different that the obviousness standard that was apparently relied upon.

Specifically,

**TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT OF THE CLAIM**

"A claim is anticipated only if each and every element as set forth in the claim is found, **either expressly or inherently described**, in a single prior art reference." . . . . "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). **The elements must be arranged as required by the claim**, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. . . . (Emphasis Added)

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MPEP § 2131, 8th Ed. Rev. 3, p. 2100-76 (August 2005)

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Thus, Quatrano must teach either expressly or inherently
each and every element as set forth in the claim.  Claim 3
recites:

A host system connected by a network to a support
host having a support services resource, the host system
comprising:

at least one application having a support module
for receiving a user request; and

a first support interface module comprising:

a session handler for receiving the user
request from the support module and for
controlling the activities of the first support
interface module;

at least a first session generated by the
session handler for processing the user request;

a first transport handler initialized by
the at least a first session for managing
communications with the support host; and

at least a first transport generated by the
first transport handler for communication of the
at least a first session with the support
services resource.

Applicant first notes that Claim 3 defines a specific
configuration in which the host system is situated.  The
preamble gives life and meaning to the claim, particularly in
view of the remarks in the final rejection.  Again, the MPEP
directs:

"[A] claim preamble has the import that the claim as a
whole suggests for it." Bell Communications Research, Inc.
v. Vitalink Communications Corp., 55 F.3d 615, 620, 34
USPQ2d 1816, 1820 (Fed. Cir. 1995). "If the claim
preamble, when read in the context of the entire claim,
recites limitations of the claim, or, if the claim
preamble is 'necessary to give life, meaning, and

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**vitality' to the claim, then the claim preamble should be construed as if in the balance of the claim."**  (Emphasis added).

MPEP 2111.02, 8th Ed., Rev. 3, p-2100-51 (August 2005).

Thus, Claim 3 recites in part a first transport for communication . . . with the support services resource of a support host that is connected to the host system by a network. The rejection relied upon the collaboration adapter as teaching exactly the support interface module.  However, Quatrano taught:

> . . . The collaboration adapter 200 of this invention within the web server 30 allows each of the participant computer users 10 through 24 to collaboratively interact together with a single shared session 16 when accessing an application served by the application server 50 via the web server 30.

Quatrano, Col. 12, lines 60 to 65.

Thus, the collaboration adapter is connected between computer users 10 through 24 and application server 50 via web server 30.  There is no teaching or even suggestion of support services or a support host associated with collaboration adapter 200.  Nevertheless, the rejection cited Col. 23, lines 41 to 55 of Quatrano as teaching exactly the first transport. Col. 23, lines 41 to 55 teach:

> Next, in step 424, the collaboration adapter 200 generates a shared session participant identification number for the new HTTP participant session (state 34-2) for participant 20 and generates a shared session cookie/ID and a shared session participant cookie/ID to be assigned to the new participant session for participant 20. The shared session participant identification number, as explained above in step 402, identifies participant 20 as a member of the shared session. The shared session and shared session participant cookies respectively identify the identity of the shared session and a unique identity for the shared session participant (participant 20 in this example) and, as will be explained, will be returned to

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the participant 20 for future identification of subsequent requests 110 made to the web server 30 from participant 20.

Nowhere, in this section is a support services resource described. Cookies for a shared session are unrelated to a support services resource and fail to teach "the at least first session with support services resource." Moreover, such a session is not inherent in a shared session for a participant. Accordingly, Quatrano fails to satisfy the requirements of the MPEP for an anticipation rejection as quoted above.

Also, the rejection cited Quatrano, Col. 23, lines 12 to 26 as teaching exactly the transport handler of Claim 3. Applicant first notes that the transport handler is part of the support interface module that the rejection identified as being collaboration adapter 200. However, Col. 23, lines 12 to 26 describes HTTP handler interceptor 32 and actions on the user computer. Fig. 3 of Quatrano shows HTTP handler interceptor 32 and the user computers as being separate and distinct from collaboration adapter 200. Thus, the rejection takes interceptor 32 and places interceptor 32 inside collaboration adapter 200 to make Quatrano read on Applicant's invention as recited in Claim 3. This cannot be done in an obviousness rejection without citation to a motivation and so is wholly inappropriate for an anticipation rejection.

The first paragraph, Col. 23 lines 23 to 22, is described as being performed by a web browser (See 421 in Fig. 5 of Quatrano) while the second paragraph, Col. 23, lines 23 to 26, is described as being performed by the HTTP handler interceptor. These two items are shown as being on different systems in Quatrano, while all the elements recited in Claim 3 are in a host system. Elements on two different systems are not part of the collaboration adapter 200. This is but further evidence that the anticipation rejection of Claim 3 is not well founded. Only one of the above distinctions is necessary to

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overcome the anticipation rejection. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of Claim 3.

Claims 4 to 6 depend from Claim 3 and distinguish over Quatrano for at least the same reasons are Claim 3. Again, Applicant points out that Quatrano defines "an application" and the rejection ignores this definition and cites to elements in Quatrano that Quatrano expressly defined as being different from the application. Applicant requests reconsideration and withdrawal of the anticipation rejection of each of Claims 4 to 6.

Claims 1, 2, 7, and 9 to 12 stand rejected for similar reasons as stated in the rejection with respect to Claim 3. The above comments with respect to Claim 3 are incorporated herein by reference for each of Claims 1, 7 and 10. As noted above, the rejection redefines elements in Quatrano and selects elements from different systems as teaching Applicant's inventions. Such re-definitions and combinations are not taught by the reference and so cannot form the basis for an anticipation rejection. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of each of independent Claims 1, 7 and 10.

Claim 2 depends from Claim 1 and distinguishes over Quatrano for at least the same reasons are Claim 1. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 2.

Claims 8 and 9 depend from Claim 7 and distinguish over Quatrano for at least the same reasons are Claim 7. Applicant requests reconsideration and withdrawal of the anticipation rejection of each of Claim 8 and 9.

Claims 11 and 12 depend from Claim 10 and distinguish over Quatrano for at least the same reasons are Claim 10. Applicant requests reconsideration and withdrawal of the anticipation rejection of each of Claim 11 and 12.

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Claims 1 to 12 remain in the application. Claims 1, 7 and 10 have been amended. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

**CERTIFICATE OF TRANSMISSION**
I hereby certify that this correspondence is being facsimile transmitted to the U.S. Patent and Trademark Office, Fax No. (571) 273-8300, on November 8, 2005.

Jan O'Dell     November 8, 2005
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Respectfully submitted,

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